

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

BALCHEM CORPORATION and ALBION
LABORATORIES, INC.,

Plaintiffs,

v.

DANIEL TODD EDWARDS and MIL
AGRO, INC.,

Defendants.

**Civil Action No.: 7:18-CV-02677-KMK-
JCM**

DEFENDANTS' MOTION TO FILE UNDER SEAL

Defendants move for leave to file unredacted versions of Defendants' Motion for Summary Judgment on: 1) Trade Secret Claims; 2) Breach of Contract Claims; 3) Fraudulent Inducement Claims; and 4) False Advertising Claims ("Defendants' Motion".)

A redacted version of Defendants' Motion was filed via ECF on December 20, 2019 (ECF No. 174.) This motion contains deposition testimony, excerpts from expert reports, other information Plaintiffs consider to be trade secrets, and other highly confidential information. Pursuant to Section 14 of the Protective Order (ECF No. 52), Defendants seek leave to file the unredacted copies of the above listed documents, and their exhibits, under seal in order to preserve the confidentiality of the information contained therein.

Accordingly, the Defendants respectfully request leave to file the above referenced document (ECF No. 174) under seal.

Dated: December 20, 2019

DANIEL TODD EDWARDS and MIL
AGRO, INC

By: /s/ C.J. Veverka

C.J. Veverka

Michael J. Howell

Michael A. Manookin

Alexis K. Juergens

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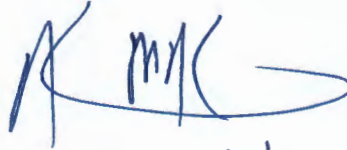
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Granted.

So Orderd.

A handwritten signature in blue ink, appearing to be "MJK" with a large flourish extending to the right.

1/7/20